## BELDOCK LEVINE & HOFFMAN LLP 99 PARK AVENUE, PH/26TH FLOOR

NEW YORK, N.Y. 10016

JONATHAN MOORE JONATHAN K. POLLACK DAVID B. RANKIN LUNA DROUBI CYNTHIA ROLLINGS STEPHEN J. BLUMERT HENRY A. DLUGACZ MARC A. CANNAN DOMINIQUE DAY MYRON BELDOCK (1929-2016) LAWRENCE S. LEVINE (1934-2004) ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400 FAX: (212) 277-5880 WEBSITE: blhny.com

COUNSEL BRUCE E. TRAUNER PETER S. MATORIN KAREN L. DIPPOLD JEFFREY A. GREENBERG MARJORY D. FIELDS FMILY JANE GOODMAN (JUSTICE, NYS SUPREME COURT, RET.) FRANK HANDELMAN

REE:

February 7, 2020

WRITER'S DIRECT CONTACT:

## VIA ECF

Hon. Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re:

Calvin Buari v. City of New York, et al.

Case No. 18-CV-12299 (MKV)

Your Honor:

My firm, along with co-counsel Cuomo LLC, represent plaintiff Calvin Buari in this civil rights action brought against the City of New York and several New York City Police Department Police Officers and members of the Bronx County District Attorney's office.

I write to respectfully request a three-page enlargement of the 25-page limit for Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Dismiss the First Amended Complaint, which is due to be filed on February 10, 2020. The 25-page limit for memoranda of law in support and opposition to motions was set by set by the Individual Practices of Judge Edgardo Ramos that controlled when Defendants' motion was filed. Plaintiff requires the additional pages to fully address and respond to the arguments raised in Defendants' moving brief, which is 28 pages long. Defendants consent to Plaintiff's request.

Plaintiff thanks the Court for its consideration of this matter.

Respectfully submitted,

/s/Marc A. Cannan Marc Λ. Cannan

Alan Scheiner, Esq., and Frank Deluccia, Esq., Attorneys for Defendants (by cc:

Oscar Michelin, Esq, Attorney for Plaintiff (by ECF)